

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**IN RE:**

Greens 126, L.P. and  
Oaks 198, L.P. and  
Trails 240, L.P.

**DEBTOR(S)**

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No. 08-36470  
No. 08-36471  
No. 08-36472

Chapter 11

**Application of Debtor for Authority to Employ And Enter Into Contract  
With Property Consulting Group**

COME NOW, Greens 126, L.P., Oaks 198, L.P., and Trails 240 L.P., Debtors herein, and respectfully request the following:

1. Debtors filed a petition for relief under Chapter 11 of the Bankruptcy Code on October 7, 2008, and are operating their respective businesses of managing and leasing apartments.

2. Debtors annually pay property taxes on the order of \$310,000 for the three properties. The property taxes are based on the tax appraised values of the real estate and improvements.

3. In order to ensure Debtors have taken every reasonable measure to lower their operating costs to improve their opportunity for a successful reorganization, Debtors believe it is reasonable and necessary for them to employ professionals who are in the regular business to challenge tax appraisals in order, at minimum, to be held constant, or on the upside, to get them reduced. Debtors have interviewed a number of providers of these types of services and would suggest to this Court that Property Consulting Group ("PCG"), be authorized to provide the necessary services in the role of property tax consultants. Debtors

feel PCG is well qualified for this work and have selected them as the preferred supplier after interviewing and evaluating other adjusters and their qualifications. The qualifications of PCG are attached as Exhibit A.

4. To the best of the Debtors' knowledge and belief, PCG is disinterested and does not hold or represent any interest adverse to the Debtors' bankruptcy estates, either individually or collectively. Moreover, PCG has no connections with the Debtors, creditors or any other party-in-interest, their respective attorneys and accountants, the United States Trustee or any person employed in the office of the United States Trustee other than as disclosed by PCG in the Verified Statement (Exhibit B) under Bankruptcy Rule 2014 filed contemporaneously herewith.

5. Retention and employment of PCG would be to the material benefit of the Debtors and would give not only short term benefit, but also longer term benefit as the tax base is lowered in terms of year to year percentage increases.

6. The fees which would be charged to Debtors would be in accordance with the contract attached as Exhibit C. Briefly for the Court's benefit, the fees charged are calculated based on the actual achieved savings (the difference between the tax assessment before and after their services have been provided for a particular tax year). The fee is a 15% commission on the actual savings.

7. To date, PCG has not requested nor has it received a retainer post-petition in anticipation of the Court's approval of this Motion to Employ and Enter Into Contract.

8. Any post-petition fees incurred by PCG for Debtors will be paid directly from funds operating funds of the Debtors, which is the subject of a cash collateral agreement previously approved by this Court, and this is understood by PCG. Unless the Court

requests otherwise, Debtors and PCG do not anticipate requesting court approval for payment of their fees consistent with the attached contract.

9. LMREC CDO II REO I ("Legg Mason"), the secured lender on the cash collateral *et al.* does not oppose this Application and approves the employment of PCG to perform the services as outlined in this Application.

WHEREFORE, PREMISES CONSIDERED, Greens 126, L.P., Oaks 198, L.P., and Trails 240 L.P., Debtors herein, pray the Court to authorize the employment and permission to enter into contract with PCG to provide professional consulting services regarding their property taxes consistent with the attached contract.

Respectfully submitted this the 4t day of June, 2009

/s/ Michael Louis Catrett  
Michael Louis Catrett  
SBN 24049057  
ADM 589119  
Britt & Catrett, P.C.  
4615 S.W. Fwy., Suite 500  
Houston, TX 77027  
(713) 666-0807  
(713) 355-8382 facsimile

**Certificate of Service**

I, the undersigned, hereby certify that a true and correct copy of the foregoing instrument has been duly served upon the entities listed below by First Class Mail, Postage Pre-paid or by electronic means on this the 3rd day of April, 2009.

**U.S. Trustee:**

Christine March  
United States Trustee  
Bob Casey Federal Building  
515 Rusk Avenue, Suite 3401

Houston, Texas 77002

Property Consulting Group  
2611 FM 1960 Road West, Suite A-102  
Houston, TX 77068

Greens 126, L.P.  
Oaks 198, L.P.  
Trails 240, L.P.  
8045 Antoine #189  
Houston, TX 77088

A-1 Helium & Balloons  
2244 1st Street  
Rosenberg, TX 77471

Aldine ISD  
14909 Aldine Westfield Road  
Houston, TX 77032-3027

Apartment Data Services  
1500 South Dairy Ashford,  
Suite 175  
Houston, Texas 77077

Apple Pest Control  
  
1422 Yale street  
Housotn, Texas 77008

AT&T  
P. O. Box 600670  
Jacksonville, FL 32260

Centerpoint Energy  
P. O. Box 2628  
Houston, TX 77252-2628

Chao, Koy  
5300 West Gulf Bank Road #1404  
Houston, Texas 77088

Christine March  
Untied States Trustee Office  
Bob Casey Courthouse  
515 Rusk St.  
Houston, TX 77002

City of Houston, Water Dept.  
P.O. Box 1560  
Houston, TX 77251

Claudia Gomez

Creative Property Managment, Inc.  
c/o Allen J. Segal  
1200 Briarcrest, Suite 3100  
Bryan, TX 77802

Briana Cioni/Peter D'Aprice  
Stutzman, Bromberg,, Esserman & Plifka  
2323 Bryan St. Suite 2200  
Dallas, TX 75201

Direct Energy  
P.O. Box 650273  
Dallas, TX 75265-0273

First Advantage  
P.O. Box 31462  
Tampa Fla 33631-3462

Harris County et al  
c/o John P. Dillman  
Linebarger, Goggan  
Blair & Sampson  
P.O. Box 3064  
Houston, Texas 77253-3064

HPES  
20202 Highway 59 North #325  
Humble, Texas 77338-2402

IRS- Insolvency Division  
P. O. Box 21126  
Philadelphia, PA 19114

Lee, James  
1835 Conestoga Court  
Merced, Ca 95348

Lee, Mae Po Sae  
5300 West Gulf Bank Road #606  
Houston, Texas 77088

Legg Mason Real Estate Capital III  
10880 Wilshire Blvd, Suite 1750  
Los Angeles, CA 90024

Lion Distributing  
POB 565  
Reisterstown MD 21136-0565

Marmill Landscaping  
P.O. Box 771611  
Houston, Texas 77215-1622  
Attn. Elizabeth Hanks

O'Connor & associates  
2200 North Loop  
Houston

Real Page  
4000 International Parkway,  
Carrollton, Texas 75007

Rent.com  
2425 Olympic Blvd. Suite 400E  
Santa Monica, Ca

Solar Verde  
20533 Biscayne Blvd. #765  
Aventura, FL 33180

Thomas J. Masenga  
Allen Matkins Leck Gamble  
Mallory  
& Natsis  
515 S. Figueroa St., 7th Floor  
Los Angeles, CA 90071-3398

Waste Management  
PO Box 55409  
Houston, Tx 77255-5409

Wilmar Supply  
200 East Park Dr. Suite 200  
Mt. Laurel, NJ 08054

Ameristar Glass  
P.O. Box 29309  
Dallas, TX 75229

Apartment Home Living  
9430 research Blvd.  
Echelon Building II, Suite 100  
Austin, Texas 78759

Cyrus N. Ansari/Jared W. Hays  
Stutzman, Bromberg,,  
Esserman & Plifka  
2323 Bryan St. Suite 2200  
Dallas, TX 75201

Data Rush Couriers  
  
1298 North Post Oak Rd.  
Houston, TX 77055

For Rent . Com  
75 Remittance Drive #1711  
Chicago, Il 60675-1711

ECG Telephone  
P.O. Box 606  
Bartlesville, OK 74005

Houston Multi-Housing  
4810 Westway Park Blvd.  
Houston, Texas 77041

Kroger, Myers - LLP  
3100 Wesleyan, Suite 300  
Houston, TX 77027

Legg Mason Real Estate Capital III  
10880 Wilshire Blvd, Suite 1750  
Los Angeles, CA 90024

Message America  
P.O. Box 682812  
Houston, Texas 77268

Monitronics  
8628 Innovation Way  
Chicago, IL 60682-0086

Presto Supply  
580 North Shepherd  
Houston, Texas 77007

Ambit Energy  
1801 North Lamar St., Suite 200  
Dallas, TX 75202

Ameristar Glass  
P.O. Box 29309  
Dallas, TX 75229

Andrew Zel  
5300 West Gulf Bank Road

AT&T  
POB 5001

Houston, TX 77088

Carol Stream IL 60197-5001

Best Plumbing

Brilliant Promotional  
1016 Harwin Dr., Suite 125  
Houston, TX 77036

Buena Suerte  
P.O. Box 740426  
Houston, TX 77274

Captive Audience Marketing  
5997 Brockton Ave., Suite B  
Riverside, CA 90256

Craven Carpet  
P.O. Box 801084  
Houston, TX 77280

Creative Consultants  
P.O. Box 790867  
San Antonio, TX 78279

First Advantage  
P.O. Box 31462  
Tampa Fla 33631-3462

Great American  
P.O. Box 4422  
Houston, TX 77210

GreenSheet  
P.O. Box 2025  
Houston, TX 77252

Home Depot  
PO Box 6029  
The Lakes, Nevada 88901-6029

Houston Apartment Association

Houston Multi-Housing  
4810 Westway Park Blvd.  
Houston, Texas 77041

ICC Paints  
same phone # as ICI Paints

ICI Paints  
14130 Westheimer  
Houston, Texas 77077

Job Target  
225 State Street, Suite 300  
New London, CT 06320

La Subasta  
P.O. Box 740800  
Houston, Texas 77274-0800

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1835 Conestoga Court  
Merced, Ca 95348

Lion Distributing  
POB 565  
Reisterstown MD 21136-0565

Lowes  
PO Box 530954  
Atlanta, GA 30353-0954

Message America  
P.O. Box 682812  
Houston, Texas 77268

Move for Free  
8535 Wurzbach, Suite 101  
San Antonio, TX 78240

Office Depot  
P O Box 9020  
Dept. 56-4204887268

Ricoh Customer Group  
P. O. Box 730831  
Dallas, TX 75373

Royal Chemical Corporation  
P.O. Box 1601  
Owings Mill, Md 21117

Royal Plumbing  
6750 Long Point  
Houston, Texas 77055

Saelee, May Poo  
5300 West Gulf Bank Road #606  
Houston, Texas 77088

South Cross Security  
4008 Artdale  
Houston, TX 77063

Toyota Financial Services  
P.O. Box 650686  
Dallas, TX 75265

/s/Michael Louis Catrett